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Federal Communications Commission
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December 19, 1997

WRITER'S DIRECT DIAL NUMBER
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BY HAND

Magalie Roman Salas, Secretary
Federal Communications Commission
1919 M Street, Room 222
Washington, D.C. 20554

Re: Clear Channel Television Licenses, Inc.,
WHP-TV, Harrisburg, Pennsylvania

Dear Ms. Salas:

On December 17, Clear Channel Television Licenses, Inc., the licensee of WHP-TV, Harrisburg, Pennsylvania, filed comments in MM Docket No. 87-268. The comments included a facsimile copy of the signature page. Filed herewith is an original copy of those comments.

Respectfully submitted



Christopher L. Robbins*

Enclosure

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* Admitted in Virginia only.

DEC 19 1997

Before the
Federal Communications Commission
Washington, D.C. 20554

Federal Communications Commission
Office of Secretary

In the Matter of)
)
Advanced Television Systems)
and Their Impact Upon the) MM Docket No. 87-268
Existing Television Broadcast)
Service)

To: The Commission

COMMENTS

Clear Channel Television Licenses, Inc. ("CCTL"), the licensee of WHP-TV, Harrisburg, Pennsylvania, by its attorneys, hereby submits the following comments in response to the Commission's Public Notice, released December 2, 1997, in the above-captioned proceeding.

CCTL commends the Association for Maximum Service Television, Inc. ("MSTV") for its diligent efforts to resolve the numerous complex technical issues that threaten to delay the expeditious roll-out of digital television ("DTV") service in the United States. However, while CCTL shares the belief of MSTV—and the Commission—that prompt initiation of DTV service is a paramount national public interest objective, it opposes the wholesale changes to the Commission's Table of Allotments¹ suggested by MSTV. The issues raised by MSTV in its ex parte filing submitted November 20, 1997, such as

¹ See Sixth Report and Order, MM Docket No. 87-268, adopted April 3, 1997, FCC 97-115 (released April 21, 1997).

reducing interference to analog and digital service in congested areas of the country and addressing short-spacing problems created by adjacent DTV channels, are more appropriately handled on a case-by-case basis, rather than through a new Table. The adoption of a new Table at this point would force most broadcasters to replicate the process of analyzing their individual allotments, thereby causing further delay and thwarting the Commission's goal of rapidly implementing DTV service.

Specifically, MSTV's suggested changes would have a significant adverse effect on station WHP-TV. In its DTV Table of Allotments, the Commission has allotted DTV channel 4 to WHP-TV. The MSTV plan, however, proposes without explanation that WHP-TV transmit from DTV channel 66, a channel which is clearly outside the DTV "core spectrum."² As a result, WHP-TV would be forced to relocate to a channel within the core spectrum at the end of the DTV transition period, incurring substantial additional equipment expenses and increasing viewer confusion in the process.

In addition to creating these inherent problems, MSTV's proposed relocation of WHP-TV to DTV channel 66 fails to advance its primary goal of reducing interference to digital service. MSTV proposes to allot DTV channel 4 to WITF-TV, Harrisburg, Pennsylvania, in lieu of DTV channel 36 as set forth in the Commission's Table. WITF-TV, however, is in the same market as WHP-TV, has its antenna collocated on the WHP-TV tower, and would transmit at roughly the same DTV power as WHP-TV.

² At the end of the DTV transition period, the Commission intends to locate all DTV channels within a "core spectrum" of either channels 2-46 or 7-51. See Sixth Report and Order at ¶ 83.

MSTV thus capriciously swaps DTV channel 4 from one station to the other without an accompanying improvement in the quality of the digital operations.

CCTL is anxious to begin constructing a digital facility for WHP-TV and is ready to move forward quickly with initiation of service on DTV channel 4. The numerous changes suggested by MSTV will only delay CCTL's plans. Accordingly, CCTL urges the Commission to reject the MSTV proposal and, instead, to continue working with the existing DTV Table of Allotments.

Respectfully submitted,

CLEAR CHANNEL TELEVISION LICENSES, INC.

By: 

Name: Kenneth E. Wyker

Title: Senior Vice President for
Legal Affairs

December 16, 1997